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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

AUGUSTINE CALLEROS, JR.,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS, a municipal  
corporation,

Defendant.

CASE NO.: 2:23-cv-01340-GMN-DJA

**STIPULATION TO EXTEND DEADLINE  
TO RESPOND TO DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT  
[ECF No. 44]**

(Second Request)

Plaintiff, Augustine Calleros, Jr. ("Calleros"), by and through his counsel, Melanie Hill Law, and Defendant City of North Las Vegas ("CNLV"), by and through its counsel, Madison Zornes-Vela, hereby stipulate to extend the deadlines for Mr. Calleros to respond to the City of North Las Vegas's Motion for Summary Judgment filed on August 28, 2024 [ECF No. 44] from the current deadline of October 18, 2024 to November 18, 2024. This Stipulation is made at the request of Plaintiff's counsel for the reasons set forth herein. This is the second request to extend the deadline to respond to this dispositive motion.

In support of this Stipulation and Order, the parties state as follows:

1. The current deadline to respond to the City of North Las Vegas's Motion for Summary Judgment filed on August 28, 2024 [ECF No. 44] is October 18, 2024. The parties have

1 agreed to a second extension of the deadline thirty additional days from the current deadline of October  
2 18, 2024 until November 18, 2024.

3 2. Counsel for Plaintiff reached out to counsel for Defendant requesting an additional thirty-  
4 day extension of the response deadline due to Plaintiff's council's elderly father's current health issues  
5 that she is assisting him with that have resulted in her being out of the office significantly over the last  
6 3 1/2 weeks and council for Defendant has agreed to the requested extension.

7 3. This stipulation to extend the dispositive motion deadlines is brought in good faith, with a  
8 showing of good cause, and is not sought for any improper purpose or other purpose of delay, but to  
9 allow counsel for the Plaintiff the additional time requested to respond to the dispositive motion  
10 considering the issues she has described herein with her elderly ailing father.

11 WHEREFORE, the parties respectfully request by this stipulation that the Court extend the  
12 deadlines for Mr. Calleros to respond to the City of North Las Vegas's Motion for Summary Judgment  
13 filed on August 28, 2024 [ECF No. 44] from the current deadlines of October 18, 2024 to November  
14 18, 2024.

15 DATED this 18th day of October, 2024.

16 Respectfully submitted,

17 MELANIE HILL LAW PLLC

18 /s/ Melanie Hill

19 Melanie A. Hill, Esq. (NV Bar No. 8796)  
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21 Las Vegas, NV 89134  
22 Tel.: (702) 362-8500  
23 *Attorney for Plaintiff Augustine Calleros, Jr.*

16 Respectfully submitted,

17 NORTH LAS VEGAS CITY ATTORNEY

18 /s/ Madison Zornes-Vela

19 Madison Zornes-Vela, Esq. (NV Bar No. 13626)  
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21 North Las Vegas, Nevada 89030  
22 Tel: (702) 633-1057  
23 *Attorney for Defendant City of North Las Vegas*

24 IT IS SO ORDERED:

25   
26 GLORIA M. NAVARRO  
27 UNITED STATES DISTRICT JUDGE

28 Dated: October 21, 2024